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1 David W. Shapiro (CA Bar No. 219265) dshapiro@boerschshapiro.com 2 **BOERSCH SHAPIRO LLP** 1611 Telegraph Ave., Suite 806 3 Oakland, CA 94612 Telephone: (415) 500-6644 4 Attorney for Defendant 5 CELIA ATKINSON 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 UNITED STATES OF AMERICA. Case No. CR14-000167 CRB 12 Plaintiff, STIPULATION AND [PROPOSED] ORDER CONTINUING STATUS v. 13 **CONFERENCE** CELIA ATKINSON. 14 15 Defendant. 16 Defendant CELIA ATKINSON, by her counsel David W. Shapiro, and the United States 17 Attorney, by its counsel Special Assistant U.S. Attorney Katherine Lloyd-Lovett, hereby stipulate 18 and agree that a status conference be set for January 20, 2016, at 2:00 p.m., or as soon thereafter as 19 may be convenient to the Court. 20 The grounds for this stipulation are as follows: 21 1. This case is currently scheduled for a status conference on December 23, 2015. 22 2. The defense and the government have discussed a disposition of diversion for Ms. 23 Atkinson. The Pretrial Services office has completed its investigation and recommended diversion to 24 the government. The government is now reviewing that recommendation and needs additional time 25 beyond the current scheduled court date of December 23, 2015. 26 3. The parties have agreed that a continuance to January 20, 2016 is reasonable, and the 27 Court is available on that date. 28 STIPULATION & [PROPOSED] ORDER

CONTINUING STATUS CONFERENCE

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	4.	The parties request that the Court exclude time between December 23, 2015 and
Janua	ary 20, 2	016 from the calculation of time under the Speedy Trial Act, 18 U.S.C.§ 3161, to allow
for th	e effecti	ve preparation of counsel for possible diversion. The parties agree that the ends of
justic	e in grar	nting the continuance and excluding time outweigh the best interest of the public and the
defer	dant in a	a speedy trial.

Special AUSA Katherine Lloyd-Lovett has consented to the continuance and to the 5. exclusion of time under the Speedy Trial Act, and to the inclusion of her signature on this stipulation.

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Dated: December 21, 2015 /s/ David W. Shapiro

DAVID W. SHAPIRO Attorney for Defendant Celia Atkinson

/s/ Katherine Lloyd-Lovett _ KATHERINE LLOYD-LOVETT Special Assistant U.S. Attorney

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1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 UNITED STATES OF AMERICA, Case No. CR14-000167 CRB 12 Plaintiff, [PROPOSED] ORDER CONTINUING 13 STATUS CONFERENCE v. 14 CELIA ATKINSON, 15 Defendant. 16 17 18 Based on the stipulation between the parties in this case, IT IS ORDERED that a status 19 conference in this case is set for January 20, 2016 at 2:00 p.m. 20 IT IS FURTHER ORDERED that the time period between December 23, 2015 and January 21 20, 2016 is excluded in computing the time within which the trial must commence, pursuant to 18 22 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(i) and (iv). 23 IT IS SO ORDERED: 24 Dated: December 21st 2015 HONORABLE CHARLES R. BREYER 25 United States Senior District Judge 26 27 28 ORDER CONTINUING STATUS

ORDER CONTINUING STATUS
CONFERENCE
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